

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Perry J. Rowan, Rose M. Rowan,  Debtor.	: : : : :	Bankruptcy Case No.: 16-24757-CMB  Chapter 13
<hr/> Ronda J. Winnecour, Chapter 13 Trustee Movant,  v.	: : : : : :	Document No.: Related to Document No.: 166, 167
 Perry J. Rowan, Rose M. Rowan,  Respondent.	: : : : :	 <b>Hearing Date and Time:</b> June 28, 2022, at 10:00 a.m.

## **DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DISMISS**

AND NOW, comes Debtors, Perry J. Rowan and Rose M. Rowan, by and through their undersigned Counsel, Brian C. Thompson, Esquire, Thompson Law Group, P.C., and file this Response to Trustee's Motion to Dismiss, and represent as follows:

1. Paragraph 1 is admitted.
2. Paragraph 2 is admitted.
3. Paragraph 3 is denied. By way of further response, Debtors will make additional payments to cure arrears as soon as practicable.
4. Paragraph 4 is admitted. By way of further response, refer to the response to paragraph 3.
5. Paragraph 5 is denied. By way of further response, Debtors commenced an Adversary proceeding on May 2, 2022, at case no. 22-02034-CMB, to avoid the lien of Fifth Third Bank. The matter is pending before the Court.

7. Debtors are without knowledge or information to form a belief as to the truth or falsity of paragraph 7.

8. Paragraph 8 is admitted.

9. Paragraph 9 is statement, thus does not require a response. To the extent a response is required, the same is denied.

10. Paragraph 10 is denied.

WHEREFORE, Debtors respectfully request that the Trustee's Motion to Dismiss be denied.

Respectfully submitted:

Executed on: May 23, 2022

/s/Brian C. Thompson, Esquire  
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